

Information for IRS Approved Continuing Education Providers

Provided via conference call January 20, 21, 22, 2015

Return Preparer Legislation

- The Senate Finance Committee introduced a bill that would provide the Treasury Dept. and the IRS explicit authority to regulate paid tax return preparers.
- The bill was introduced by Ron Wyden from OR and Ben Cardin from MD. Both of these states now have some type of preparer regulation.
- Remember, as a result of the Loving lawsuit, the IRS CANNOT require CE and/or testing for any tax return preparers.

Provider Renewal Season

- Renewal season went very smoothly this year, but one thing we noticed is that some providers are still carrying over prior year programs. If there is any content change (new tax law, revised tax law, etc.) other than inflationary amounts, you should get a new program number.
- Federal Tax Update programs you gave in 2013 should no longer be in your 2015 account as they are no longer considered “update” programs.
- Prior to the renewal season, we contacted all providers who had 2012 programs in their accounts and asked them to delete those they no longer needed – we are assuming you will do this each year at renewal time.
- It seems the later the renewal (closer to the deadline), the more we saw every program being carried over. We give you 2-3 months to renew your account, so the intent is for you to scrutinize your program listing and only carry over those programs you will continue to offer.
- Instead of allowing you to “check all” programs to carry over to 2015, we had you individually select what you wanted to do with each one. We received only a small amount of negative feedback on taking away the “check all” option and many told us that it gave you the opportunity to review each program and make individual assessments of whether to carry it forward in 2015.
- If you did not scrutinize your programs when you renewed, please take the time to do so and delete any programs you no longer offer.
- Be careful with self-study programs, especially if you give a preparer six months to a year to take it.
- Be careful with the term “refresher” in your program names/titles – an “update” is really not a “refresher” and the term “refresher” conflicts with the Annual Federal Tax Refresher course
- If you get a new EIN or go from using a PTIN to an EIN or vice versa, please contact the CE Provider help desk at (855) 296-3150 and they will instruct you on providing the appropriate documentation.

- If your Point of Contact (POC) changes, you will need to call the CE Provider help desk at (855) 296-3150. A current provider POC can change their e-mail or their phone number, but a new point of contact must get a new login. Therefore, any changes in POCs must be assisted by the CE help desk.

PTIN Reporting

- There is a guide for PTIN reporting on the main page of your CE Provider account that will walk you through reporting, what the various icons mean, and how to fix rejected records. Click on the link “PTIN Reporting Instructions & Help Guide” to learn more about the process.
- The CE system receives a file directly from the PTIN system each Tuesday and Friday. This is what we compare against to determine the validity of PTIN completion records submitted by providers.
- Deleting programs - You MUST not have deleted the program number from your CE Provider account in the completion date year for which you are trying to submit the records. Ex: If you are submitting a record in 2015 with a completion date of 2013 or 2014, you must have the program number in the respective program link (2013 or 2014) on your main screen in order to successfully upload that record. We will add an FAQ soon to help clarify this issue.
- If you have done your due diligence in trying to resolve a rejected record and still have issues getting it to process, please contact us at rpo.ce@irs.gov so we can look into it. Remember, you should not send PII through e-mail (PTIN/name), but contact us and we will gather the information via telephone or a securely zipped file to protect the information.
- New 0 credit hour record functionality to delete PTIN records that were incorrectly submitted
 - Many of you are using this new feature; however, you must use it with caution! One provider told us an entire file was not showing up and, after some investigation, we found that the provider had sent 0 records for many of the preparers, which removed the credit from their accounts.
 - Any records you report with the same program number, PTIN and completion date and 0 credit hours will overwrite any existing records that match on those three points. They are not treated as cumulative, but will replace the existing record.
 - If you are unsure you are taking the correct steps or have any questions regarding this process, please contact the CE help desk at (855) 296-3150.
- Dealing with rejected PTIN records - we know that some preparers are not providing you the correct PTIN information. You can still report those records when you get the information from the preparer, even if the deadline has passed for reporting that quarter.
- For AFSP, as long as the completion date is on or before 12/31, the preparer could still qualify for the AFSP – Record of Completion for 2015 once we receive those program completion records. Many preparers will most likely want to be listed on the Preparer Directory, so make sure you are reporting AFTR completion records timely.
- If you use the manual entry mode for PTINs, you will know if the PTIN has a match immediately upon entering that information. This is a great way to validate information you get from preparers – i. e. preparer calls back and gives you a PTIN, you can enter it in the manual mode,

maybe even while on the phone, to see if it's a match in the comparison file. If you use the file upload for multiple records, that is not processed immediately, but you will receive an e-mail when it's time to go back and check for accepted/rejected PTIN records.

- PTIN records that were submitted before midnight ET are picked up the following morning at 7:00a.m. ET, as long as the files/records are received and accepted prior to pick-up, they will most likely go into the nightly file.
- You should tell students CE records should be visible in their PTIN accounts within 48 hours after you have “successfully” submitted the records. In other words, the Excel file status should be “Submission Complete. No further action required.” in your provider account in order for records to display in PTIN accounts within 48 hours.
- If a preparer has a new PTIN, there are several factors that might influence how quickly it is available for posting PTIN CE records. There are several internal checks that are done prior to finalizing, including confirmation of payment. As long as the preparer has been issued a PTIN, it should be in our validation file as of 2 a.m. the next bi-weekly day (Tuesday and Friday).
- Please make sure preparers know who to call you if they have problems with their CE records not showing in their PTIN accounts. Our e-mail (rpo.ce@irs.gov) is intended to service providers, not preparers. Although we are here to assist with preparer PTIN issues, the contact should come from you as a provider, not from a return preparer.
- Please make sure preparers are looking in the right place for their CE records. We provided you screen shots to assist you with preparer inquiries. We think they will be helpful in trying to assist a preparer in navigating their PTIN account and seeing their CE history.
- As we've discussed on previous calls, any excess CE in the category of Federal Tax Law Update (above the 3 hour or 6 hour amount for those taking the AFTR course) will count toward the Federal Tax Law category. This happens automatically behind the scenes for the AFSP to determine whether a preparer has enough credits for the Record of Completion. The CE for the federal tax law updates is still displayed on the federal tax law update screen, so they will not see that it is being used in the calculation for the federal tax law category. If this doesn't appear to be working correctly for a particular preparer, please send an e-mail to rpo.ce@irs.gov.

AFSP/AFTR Course

- As part of our AFSP strategy review, we will be doing a “lessons learned” analysis to determine how we move AFSP forward for 2016. This will include discussions of many issues we found during our AFTR course/test reviews, questions we received from providers in the CE mailbox, issues from preparers, and other feedback we've received.
- At this time, we don't have any statistics to share about those who participated in the AFSP – Record of Completion but, as soon as we are able to share those, we will do so.
- We looked at EVERY AFTR course/test that was being offered by CE Providers! We found providers were confused about some of the requirements and we worked with each provider to educate our expectations for the AFTR course/test
- Below are a few general findings that will help you prepare for the AFTR course in 2015 should you decide to offer it.

- It's important to understand which preparers are exempt from the AFTR course so that you are providing your students the appropriate advice regarding CE requirements. There is a chart on www.irs.gov in the AFSP section that explains the credits needed for the AFSP for 2015 and 2016.
- A preparer can take any regular CE beginning January 1, 2015 that will count toward the 2016 AFSP Record of Completion - EXCEPT the AFTR course/test, which can only be offered and taken June – December annually. The other hours, ten hours of Federal Tax and two hours of ethics can be earned at any time between January 1 and December 31 2015.
- All areas in the course outline must be covered in the AFTR course/test. We hope to provide more specificity around the depth of each area in the future.
- Be aware of the departure from normal CE standards, especially for self-study AFTR courses. For ALL self-study programs, be educated on the Word Count & Pilot Testing formulas as supported by the National Association of State Boards of Accountancy. Please review our [CE Provider Standards](#) and the [FAQs](#) for guidance and a link to the word count and pilot testing requirements.
- Some AFTR course/test marketing was misleading when it came to the number of CE hours needed for the AFSP Record of Completion, especially when bundling the AFTR course with other federal tax law and ethics programs for CE. The CE requirements need to be clear on your web site and in your brochures.
- You must have the AFTR course/test developed prior to getting a program number. We had long delays in our reviews because CE Providers had gotten program numbers prior to completing their material.
- Enrolled Agents (EA) did NOT receive any credit for participating in an AFTR course/test due to the idea that EAs are experts in the federal tax field and would benefit more from other specialty federal tax areas more relevant to their practice.
- Below are some reminders for those who did offer AFTR courses/tests and/or CE for the 2015 AFSP Record of Completion:
 - If you receive calls from preparers who have not yet gotten their e-mail to sign sub-part B and Section 10.51 of Cir 230, please remind them to check their account to see if they have the option on their main menu. Due to a timing issue, sometimes the e-mail to sign the Cir 230 statement comes later than anticipated since this process only runs weekly on Thursday nights. Friday is the best day to check for the option. If that timeframe has passed, you may contact the CE mailbox (rpo.ce@irs.gov) and we'll assist in trying to find out why the preparer is not prompted for their AFSP - Record of Completion. Steps to share with preparers on how to access the C230 statement are as follows):
 - Visit www.irs.gov/ptin and log into their PTIN account
 - On the Main Menu, select "AFSP Record of Completion – Circular 230 Consent" (or if they have a credential, the option will read "Elect to Participate in AFSP".)
 - Follow the screen prompts to elect to participate

- In 24 hours, the preparer should log in again to find their printable Record of Completion in their “View My Messages” mailbox
- These instructions were also provided to you in a letter dated December 19, 2014 and located in your online provider email box.
- All CE from 2014 should be uploaded (both the AFTR course/test AND any additional CE in federal tax law, federal tax law update, and ethics). If a preparer provides you a PTIN correction after the records were due OR they just registered for a new PTIN, you can still upload that record through your CE provider account, even if passed the 12/31 deadline (as long as the preparer completed the course and passed the test BY 12/31). If the preparer met all the requirements for the 2015 AFSP Record of Completion, they will be sent an e-mail to sign the Circular 230 so they can receive the 2015 AFSP Record of Completion.
- As a reminder about timing: the process that looks for those who met the 2015 AFSP Record of Completion qualifications runs every Thursday night. Once the preparer signs the Circular 230 statement, the process to issue the AFSP Record of Completion runs twice daily (every 12 hours). The CE system receives the PTIN validation file from the PTIN system bi-weekly (Tuesday and Friday) and PTIN records go to the PTIN system twice daily.
- Make sure you are no longer offering an AFTR course/test and that the course/test has been removed for sale from your web site. 12/31/14 was the deadline for the AFTR course/test completion and the new 2015 AFTR course outline/test parameters will not be distributed until May.
- As you prepare for next year’s AFTR course/test, remember that you will be required to cover EACH topic area in the AFTR course outline and on the test, as specified on the test parameters. We will be working on specificity of some of the items for this year’s AFTR course/test. As stated earlier, the AFTR course outline/test parameters are due to be released in May and you will be notified as soon as they are posted.

Preparer Directory

- The Directory of Federal Tax Return Preparers with Credentials and Select Qualifications will launch in early 2015. To be clear about who will be on the directory: (1) those that have a credential (CPA, EA, Attorney, ERPA, or Enrolled Actuary); (2) those who have the AFSP Record of Completion (they will be listed with the qualification “Annual Filing Season Program Participant”). There are definitions for each of the credentials and the “qualification” of AFSP Participant that a taxpayer can access on the search screen.
- A taxpayer can search by credential/qualification, radius within a zip code, or by preparer name. The distance measures from the geographic center of the zip code. Countries outside the USA and foreign zip codes are also accepted.
- Any PTIN holder who does not have a credential or the qualification of AFSP participant will NOT be listed in the directory. The directory will be updated weekly with data from the PTIN system.

Recent Communications

- On November 12, 2014, RPO provided tax practitioners the opportunity to attend a recorded webinar about RPO/AFSP with a live Q&A session. This presentation discussed the RPO's responsibilities, as well as provided baseline information and answered questions about the AFSP Record of Completion.
- The public education campaign regarding preparers was kicked off on December 9, 2014 with the News Release IR-2014-113 reminding preparers of the AFSP deadline to participate in the program. This also contained a link to the IRS-approved CE Provider public listing where preparers could find a CE Provider offering an AFTR course/test and/or CE. This was a follow-up to IR-2014-100 (October 27, 2014) discussing PTIN renewal and that AFSP – Records of Completion were to begin.
- On Dec 18, 2014, the Commissioner held a press conference to kick off the public education effort – “Choose a preparer wisely” (IR-2014-116 and FS-2014-11). This news conference discussed the considerations for choosing a tax professional, announcing a new “partner page” with options for tax assistance, and the announcement of the Directory of Federal Tax Return Preparers with Credentials and Select Qualifications.
- We will continue our public education campaign encouraging taxpayers to choose a tax professional wisely and providing options for them to do so.

Opportunities for CE Providers

- We are looking to talk to a variety of CE Providers who participated in the AFSP/AFTR course/test and would like to receive feedback for consideration. If you would like to participate in such a session, please send an e-mail to the CE mailbox (rpo.ce@irs.gov) and let us know whether you prefer a group discussion or an individual discussion with just your organization. Please send feedback to the CE mailbox if you are interested but unable to participate in a conference call.

As a reminder, the e-mail address for escalated issues or feedback is rpo.ce@irs.gov. The CE technical support phone number is 1-855-296-3150 and hours of operation are 9 a.m. to 6 p.m. ET, Mon-Fri.

For those of you participating in tax season activities, we wish you a successful tax season!